

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

BOSTON GAS COMPANY

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D.T.E. 03-40

**PETITION TO INTERVENE OF THE UNITED STEELWORKERS
OF AMERICA, AFL-CIO-CLC**

Pursuant to 220 C.M.R. 1.03(1)(a), the United Steelworkers of America, AFL-CIO-CLC ("Steelworkers") request that the Department of Telecommunications and Energy ("Department") grant it leave to intervene as a party in the above-captioned docket.

As grounds therefore, the Steelworkers state:

1. Since approximately 1972, the Steelworkers has been the chief signatory to all collective bargaining agreements with KeySpan Energy Delivery New England ("KeySpan"), concerning the terms and conditions of employment of USWA Locals 12003 and 12012.
2. The membership of Locals 12003 and 12012, including Production and Maintenance Workers, and Office and Technical Workers, jointly comprise the majority of KeySpan employees.
3. The Department's Rules permit the grant of full participation to any party with a substantial and specific interest. 220 C.M.R. 1.03(1)(e).
4. The Steelworkers has a substantial and specific interest in the Company's proposed rate changes, insofar as changes in service quality have a direct effect on its members.
5. The Steelworkers has a substantial and specific interest in the impact of the proposed rate changes insofar as they may affect the wages, and/or other benefits of employment, received by its members.
6. The Steelworkers has a substantial and specific interest in the impact of the proposed rate changes insofar as potential changes in staffing may affect the occupational safety, health, and working conditions of its members. (A number of service quality standards, such as response time to fix gas leaks, may be directly impacted by staffing levels.)
7. The Steelworkers has been granted party status in other, similar proceedings involving proposed rate changes.

8. No other party can adequately represent or address the Steelworkers' interests in this case.

9. The Steelworkers intends to participate as a full participant and take part in issues that may substantially and specifically affect its membership.

10. For the foregoing reasons, and for the same reasons that it was granted leave to intervene in prior Departmental dockets related to rate changes, the Steelworkers will be substantially and specifically affected by the Department's review and decision in this docket.

WHEREFORE, the Steelworkers, by and through its attorneys, respectfully requests that this Petition to Intervene be granted and that the United Steelworkers of America be accorded full participant intervention status in this proceeding.

Respectfully submitted,

UNITED STEELWORKERS OF
AMERICA,

By its attorneys,

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CERTIFICATE OF SERVICE